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**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

INNOCENT NGWA,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,  
INC., TRANSUNION, LLC, and THE BANK  
OF MISSOURI DBA FORTIVA,

Defendants.

Case No. 2:21-cv-02158-RFB-EJY

**JOINT MOTION AND ORDER  
EXTENDING DEFENDANT TRANS  
UNION LLC'S TIME TO FILE AN  
ANSWER OR OTHERWISE RESPOND  
TO PLAINTIFF'S AMENDED  
COMPLAINT**

**(FIRST REQUEST)**

Plaintiff Innocent Ngwa ("Plaintiff") and Defendant Trans Union LLC ("Trans Union"), by and through their respective counsel, file this Joint Motion Extending Defendant Trans Union's Time to File an Answer or Otherwise Respond to Plaintiff's Amended Complaint.

On December 7, 2021, Plaintiff filed her Complaint in this Court against Experian Information Solutions, Inc. ("Experian") only, which alleges claims pursuant to the Fair Credit Reporting Act ("FCRA"), 15 § 1681, *et seq.* Experian filed its Answer to Plaintiff's Complaint on December 28, 2021. Plaintiff filed her First Amended Complaint on April 8, 2022, alleging claims pursuant to the FCRA against Trans Union. The current deadline for Trans Union to answer or otherwise respond to Plaintiff's First Amended Complaint is May 4, 2022.

1 Plaintiff has agreed to extend the deadline in which Trans Union has to answer or  
 2 otherwise respond to Plaintiff's Amended Complaint up to and including May 25, 2022. This is  
 3 the first motion for extension of time for Trans Union to respond to Plaintiff's First Amended  
 4 Complaint.

5 Trans Union's counsel will need additional time to review the documents and respond to  
 6 the allegations in Plaintiff's First Amended Complaint. This Joint Motion is made in good faith  
 7 and not for the purposes of delay.

8 The parties will actively discuss a potential early resolution of this case, and the parties  
 9 believe an extension of this nature may save waste of the parties' time and expense. The  
 10 additional time will allow Plaintiff and Trans Union time to fully explore such early settlement  
 11 discussions.

12  
 13 Dated this 4th day of May 2022.

14  
 15 **QUILLING SELANDER LOWNDS**  
 16 **WINSLETT & MOSER, P.C.**

17 /s/ Rachael Swernofsky

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28 /s/ Yitzchak Zelman

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**Counsel for Plaintiff**

**ORDER**

The Joint Motion for Extension of Time for Trans Union LLC to file an answer or otherwise respond to Plaintiff's Amended Complaint is so ORDERED AND ADJUDGED.

Dated this 4th day of May, 2022.

  
UNITED STATES MAGISTRATE JUDGE